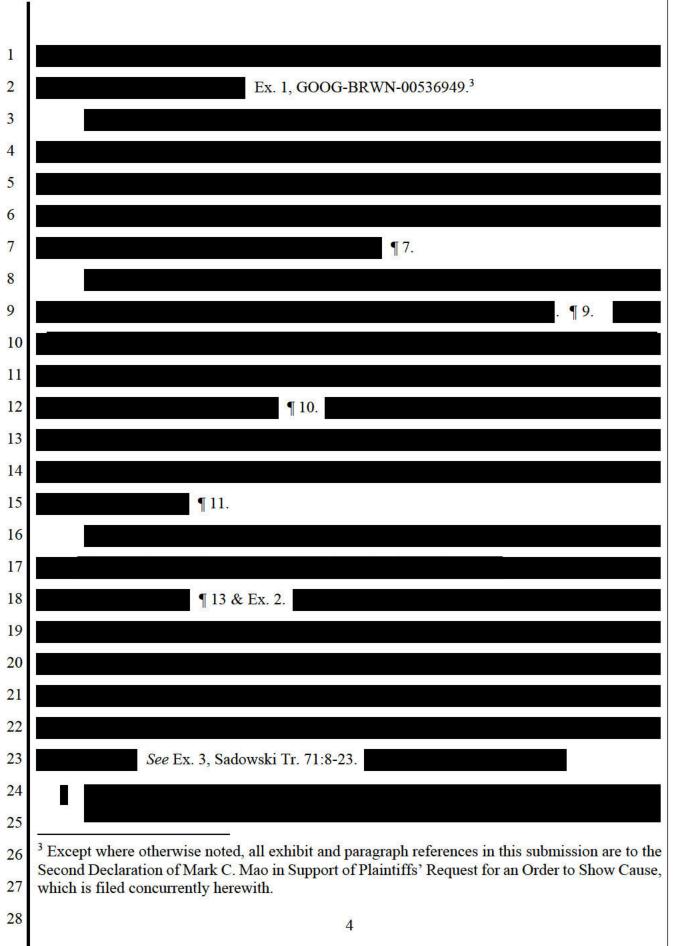
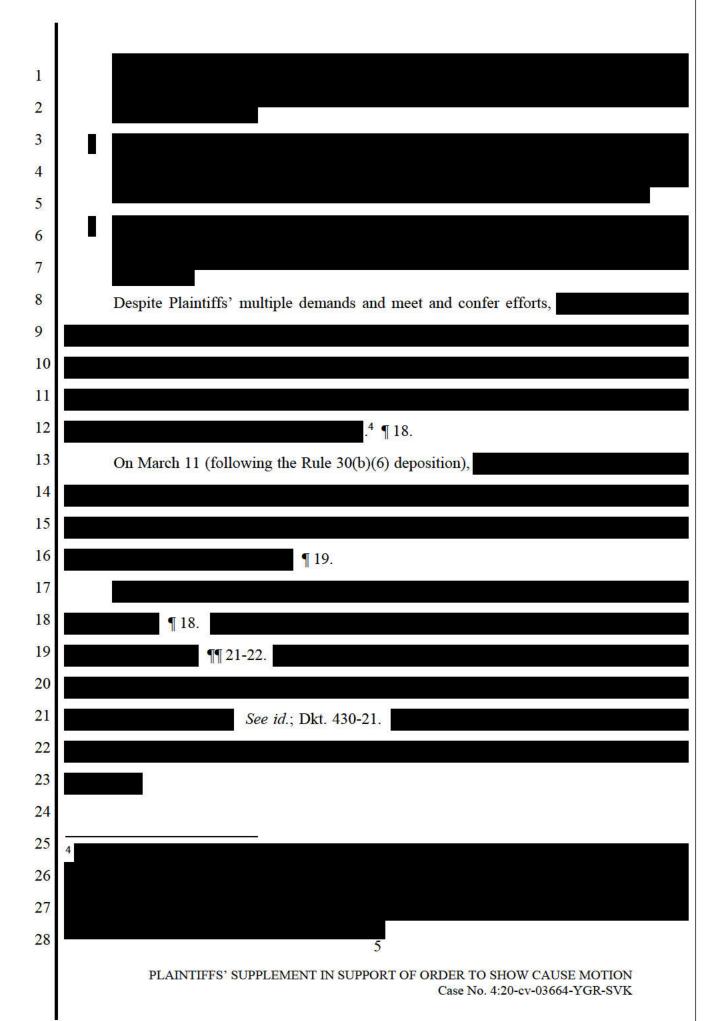
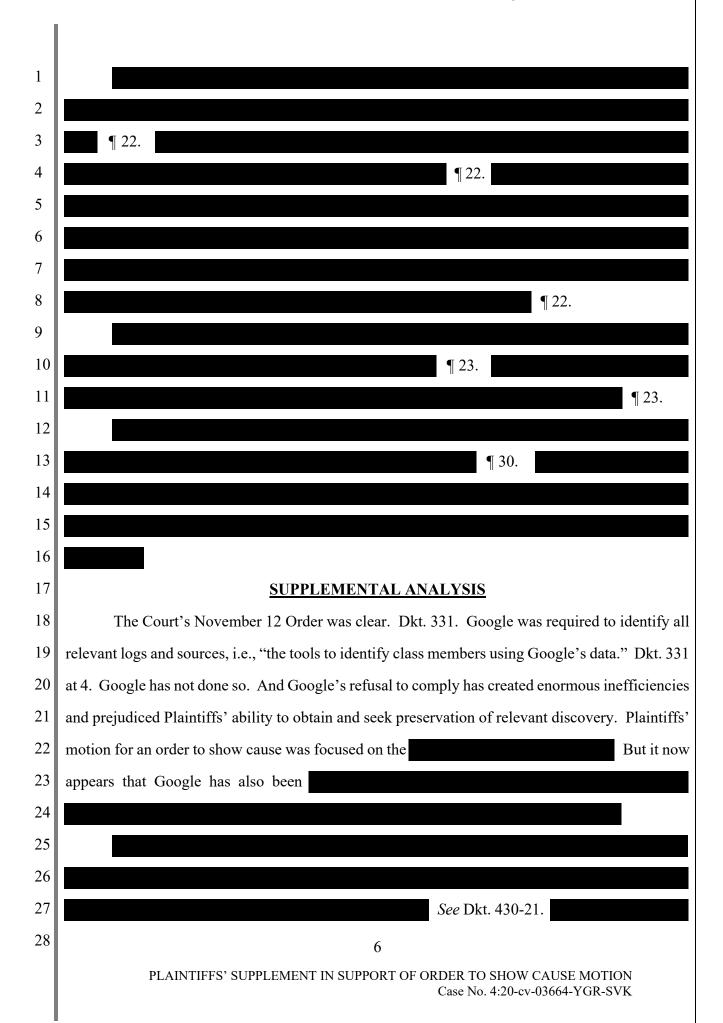
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19		DISTRICT COURT
20	NORTHERN DISTRI	CT OF CALIFORNIA
21	CHASOM BROWN, WILLIAM BYATT,	Case No.: 4:20-cv-03664-YGR-SVK
21	JEREMY DAVIS, CHRISTOPHER	
22	CASTILLO, and MONIQUE TRUJILLO	PLAINTIFFS' SUPPLEMENT IN
23	individually and on behalf of all similarly	SUPPORT OF THEIR MOTION FOR
23	situated,	ORDER REQUIRING GOOGLE TO SHOW CAUSE WHY IT SHOULD
24	Plaintiffs,	NOT BE SANCTIONED FOR
25	Vs.	DISCOVERY MISCONDUCT
23		
26	GOOGLE LLC,	The Honorable Susan van Keulen
27	D-fa-1	Courtroom 6 – 4th Floor
	Defendant.	Date: April 21, 2022
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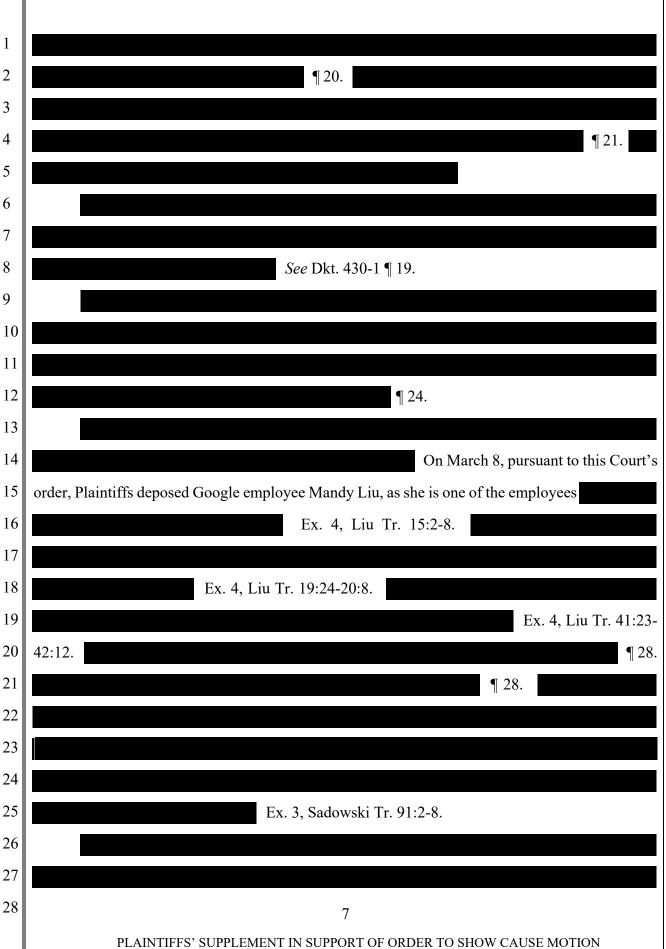
<u>INTRODUCTION</u> Since Plaintiffs filed their motion for an order to show cause why Google should not be sanctioned (Dkt. 430), .1 Plaintiffs' motion focused on Google's As confirmed in meet and confers with counsel for Google, <sup>1</sup> Plaintiffs submit this supplement to give Google an opportunity to also address these issues as part of its response to Plaintiffs' motion, due on March 30, 2022, pursuant to the parties' stipulation and proposed order (Dkt. 474), and so Google may be prepared to address them at the April evidentiary hearing. 

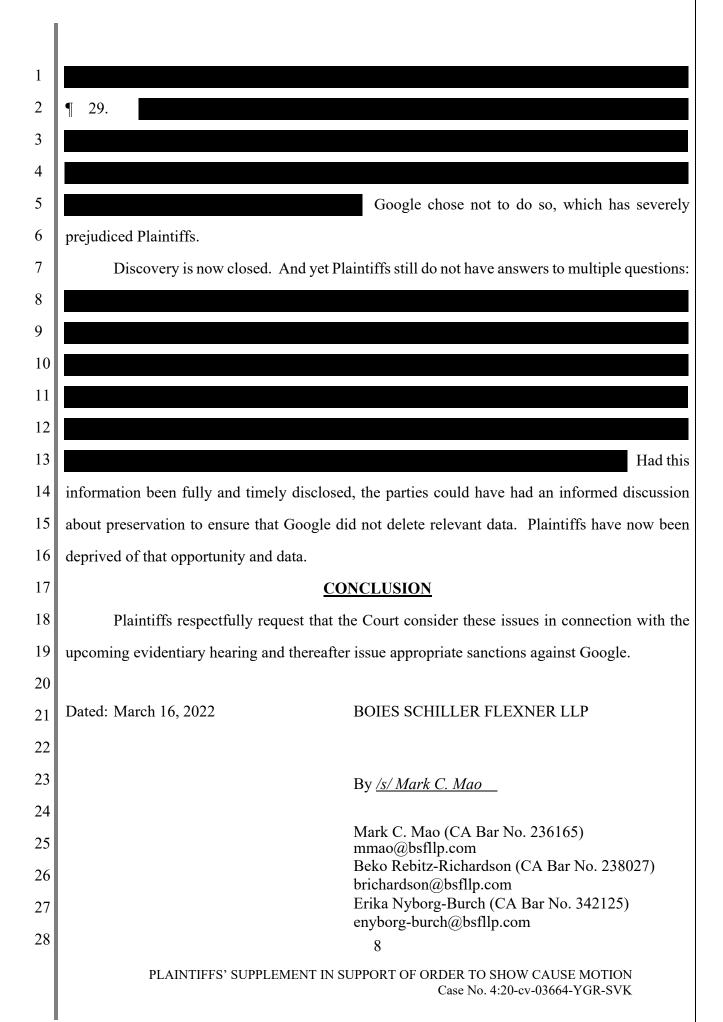
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12	As demonstrated in their moving papers, Plaintiffs have been severely prejudiced by
13	Google's discovery misconduct. But for Google's pattern of nondisclosure, Plaintiffs could have
14	(1) sought to ensure preservation of this key data at the outset of this case, and (2) completed the
15	Special Master data productions far earlier and more efficiently. In addition, (3) Plaintiffs were
16	entitled to all of the
17	and to schedule depositions based on those documents. Plaintiffs respectfully request that the
18	Court issue appropriate sanctions against Google, as Plaintiffs requested in their moving papers.
19	SUPPLEMENTAL FACTS
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	DI AINTIEES' SUIDDI EMENT IN SUIDDORT OF ORDER TO SHOW CAUSE MOTION











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